

9. It is denied that respondent and child lived together at the familial residence until the date of separation.

10. It is denied that the child lived with the petitioner from birth until to removal and that the child was provided for financially by the petitioner.

11. It is admitted that the child received certain medical attention, attended church at times, and attended parties. It is admitted that the child received vaccinations. Any allegations regarding petitioner's treatment of respondent and the child based on exhibit F are denied. It is admitted that exhibit G shows copies of pictures of the child with petitioner and respondent.

12. The respondent is without sufficient information to admit or deny.

13. Admitted.

14. Denied.

15. Denied.

16. The respondent is without sufficient information to admit or deny.

17. It is denied that this is the current address of the child.

18. It is denied that the petitioner has no criminal history.

19. Admitted.

20. Denied.

21. The respondent is without sufficient information to admit or deny.

22. It is denied that respondent's removal and retention of the child is wrongful based on the legal arguments stated.

23. It is denied that respondent is wrongfully retaining her child.

24. Denied.

25. It is denied that the child is now two-years-old but it is admitted that the Hague Convention applies.

26. Denied.

27. Respondent denies that petitioner is entitled to any relief.

28. Respondent denies that petitioner is entitled to any relief.

29. Respondent denies that petitioner is entitled to any relief.

It is denied that petitioner is entitled to any relief whatsoever.

All averments not specifically admitted are hereby denied.

AFFIRMATIVE DEFENSES:

1. Returning the child to Honduras would pose a grave risk that doing so would expose the child to physical or psychological harm or otherwise place the child in an intolerable situation.

2. Returning the child would not be permitted by the fundamental principles of the requested statement relating to the protection of human rights and fundamental freedoms.

Respectfully submitted this 16th day of February, 2017

RITCHIE, DILLARD, DAVIES & JOHNSON, P.C.

/s/ WADE V. DAVIES
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing has been filed electronically this 16th day of February 2017. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

Wade V. Davies
WADE V. DAVIES